

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

CLAIR REYNOLDS, MONICA  
MARTIRANO, BRADY LAING,  
JARED THOMAS PINEDA,  
WILLIAM MARTIN POWERS,  
TRINA HANCOCK, and KEN  
SCHAFER, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

FCA US LLC,

Defendant.

Case No. 2:19-cv-11745-AJT-EAS

Senior District Judge Arthur J. Tarnow

Magistrate Judge Elizabeth A. Stafford

**DEFENDANT FCA US LLC'S  
NOTICE OF SUPPLEMENTAL AUTHORITY  
IN SUPPORT OF ITS MOTIONS TO DISMISS**

Defendant FCA US LLC respectfully submits this notice to alert the Court to new authority in support of its pending motions to dismiss (ECF Nos. 26, 34). In opposing dismissal, Plaintiffs have argued that a dismissal on mootness grounds would be improper because they seek damages for a purported loss in market value of their vehicles. *See, e.g.*, ECF No. 27, PageID.2785; ECF No. 31, PageID.3384. However, on November 30, 2020, District Judge Gershwin A. Drain rejected this very argument when dismissing a similar case as moot. *See* Opinion and Order Granting Defendant's Motion to Dismiss Amended Complaint in *Flores v. FCA US LLC*, Case No. 19-10417, Docket No. 44 (attached hereto as Exhibit A), pp. 8-12.

Dated: December 4, 2020

Respectfully submitted,

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